

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KENG HENG, INC.,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action
	)	Docket No. 02CV3605
AMERICAN HOME ASSURANCE COMPANY	)	
and FEDERAL INSURANCE COMPANY	)	
a/k/a CHUBB GROUP OF INSURANCE	)	
COMPANIES	)	
Defendants.	)	
	/	

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**DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Defendants, American Home Assurance Company and Federal Insurance Company (hereinafter "Defendants"), by and through their undersigned attorneys and pursuant to Fed. R. Civ. P. 6(b)(1), hereby file their Unopposed Motion for Enlargement of Time to respond to Plaintiff's Complaint. In support of this Motion, Defendants state:

1. On or about June 28, 2002, Plaintiff served its Complaint against Defendant American Home Assurance Company.
2. On or about July 1, 2002, Plaintiff served its Complaint against Defendant Federal Insurance Company.
3. At present, Defendant American Home Assurance Company's response to Plaintiff's Complaint is due on July 18, 2002, and Defendant Federal Insurance Company's response is due on July 21, 2002.
4. Due to the processing of this Complaint between the Defendants (who are co-sureties on the bond in question) and the principal of the bond, Balfour Beatty Construction, Inc., counsel for Defendants did not receive the Complaint until July 15, 2002.

7. In order to fully represent Defendants' interests and to fully address the issues raised in the Complaint, additional time is necessary to respond to the Complaint.

8. Accordingly, Defendant American Home Assurance Company hereby requests a fourteen (14) day extension of time for filing and serving its response to Plaintiff's Complaint. If granted, the deadline for filing and service of the responsive pleading would be August 1, 2002.

9. Similarly, Defendant Federal Insurance Company hereby requests an eleven (11) day extension of time for filing and serving its response to Plaintiff's Complaint. If granted, the deadline for filing and service of the responsive pleading would be August 1, 2002.

10. This is the Defendants' first request for an extension of time for responding to the Complaint.

11. Counsel for Defendants has conferred with Plaintiff's counsel regarding this requested enlargement and Plaintiff's counsel does not oppose the same.

WHEREFORE, Defendants, American Home Assurance Company and Federal Insurance Company, respectfully request an extension of time until August 1, 2002 for responding to the Complaint filed by Plaintiff, Keng Heng, Inc.

Respectfully submitted,

KEEFER WOOD ALLEN & RAHAL, LLP

Date: July 17, 2002

By \_\_\_\_\_

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